

**IN THE COURT OF COMMON PLEAS
COUNTY OF SUMMIT, OHIO**

INDICTMENT TYPE: DIRECT

CR. CASE NO. 2012-03-0632A,B,C,D

**INDICTMENT FOR: A,B,C,D) ILLEGAL MANUFACTURE OF DRUGS (1) 2925.04(A) F1;
ILLEGAL ASSEMBLY OR POSSESSION OF CHEMICALS FOR THE MANUFACTURE OF DRUGS
(1) 2925.041(A) F2; AGGRAVATED POSSESSION OF DRUGS (1) 2925.11(A)(C)(1) F5; ILLEGAL
USE OR POSSESSION OF DRUG PARAPHERNALIA (1) 2925.14(C)(1) M4**

In the Common Pleas Court of Summit County, Ohio, of the term of MARCH, in the year of our Lord,
TWO THOUSAND TWELVE.

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid,
being duly impaneled and sworn and charged to inquire of and present all offenses whatever
committed within the limits of said County, on their oaths, **IN THE NAME AND BY THE AUTHORITY
OF THE STATE OF OHIO,**

COUNT ONE

DO FIND AND PRESENT, That **A) RONALD S. LEGG, B) ALLEN R. KOSTRA, C) RANDY L. LEGG, and D) HEATHER M. LERCH** on or about the 26th day of February, 2012, in the County of Summit and State of Ohio, aforesaid, did commit the crime of **ILLEGAL MANUFACTURE OF DRUGS**, in that they did knowingly manufacture or otherwise engage in any part of the production of a drug Methamphetamine, a Schedule II controlled substance, in the vicinity of P.L., d.o.b. 09/10/2010, a juvenile, in violation of Section 2925.04(A) of the Ohio Revised Code, **A FELONY OF THE FIRST DEGREE**, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT TWO

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT that **A) RONALD S. LEGG, B) ALLEN R. KOSTRA, C) RANDY L. LEGG, and D) HEATHER M. LERCH** on or about the 26th day of February, 2012, in the County of Summit and State of Ohio, did commit the crime of **ILLEGAL ASSEMBLY OR POSSESSION OF CHEMICALS FOR THE MANUFACTURE OF DRUGS**, in that they knowingly did assemble or possess one or more chemicals that may be used to manufacture a controlled substance with the intent to manufacture a drug, to wit: Methamphetamine, a Schedule II controlled substance, in the vicinity of P.L., d.o.b. 09/10/2010, a juvenile, in violation of Section 2925.041(A) of the Ohio Revised Code, **A FELONY OF THE SECOND DEGREE**, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT THREE

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT that **A) RONALD S. LEGG, B) ALLEN R. KOSTRA, C) RANDY L. LEGG, and D) HEATHER M. LERCH** on or about the 26th day of February, 2012, in the County of Summit and State of Ohio, did commit the crime of **AGGRAVATED POSSESSION OF DRUGS**, in that they did knowingly obtain, possess, or use a drug, Methamphetamine, a Schedule II controlled substance, in violation of Section 2925.11(A)(C)(1) of the Ohio Revised Code, A FELONY OF THE FIFTH DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT FOUR

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT that **A) RONALD S. LEGG, B) ALLEN R. KOSTRA, C) RANDY L. LEGG, and D) HEATHER M. LERCH** on or about the 26th day of February, 2012, in the County of Summit and State of Ohio, did commit the crime of **ILLEGAL USE OR POSSESSION OF DRUG PARAPHERNALIA**, in that they did knowingly use, or possess with purpose to use, drug paraphernalia, in violation of Section 2925.14(C)(1) of the Ohio Revised Code, A MISDEMEANOR OF THE FOURTH DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

s/ Sherrri Bevan Walsh
SHERRI BEVAN WALSH, Prosecutor GWP/cs
County of Summit, Ohio

Prosecutor, County of Summit, by

s/ [Signature] Date: 3-13-12
Assistant Prosecuting Attorney

A TRUE BILL

Grand Jury Foreperson/Deputy Foreperson

IN THE COURT OF COMMON PLEAS
COUNTY OF SUMMIT, OHIO

INDICTMENT TYPE: DIRECT SUPPLEMENT ONE CASE NO. 2012-03-0632ABCD

INDICTMENT FOR: A) ENDANGERING CHILDREN (1) 2919.22(B)(1) F2;
MURDER (1) 2903.02(B) SPECIAL FELONY
D) ENDANGERING CHILDREN (1) 2919.22(B)(1) F2;
MURDER (1) 2903.02(B) SPECIAL FELONY;
COMPLICITY TO COMMIT ENDANGERING CHILDREN (1)
2919.22(B)(1)/2923.03 F2;
COMPLICITY TO COMMIT MURDER (1) 2903.02(B)/2923.03
SPECIAL FELONY;
ENDANGERING CHILDREN (1) 2919.22(A) F3;
INVOLUNTARY MANSLAUGHTER (1) 2903.04(A) F1
ABCD) ENDANGERING CHILDREN (1) 2919.22(B)(6) F2;
INVOLUNTARY MANSLAUGHTER (1) 2903.04(A) F1;
ILLEGAL MANUFACTURE OF DRUGS (1) 2925.04(A) F1;
INVOLUNTARY MANSLAUGHTER (1) 2903.04(A) F1;
ILLEGAL ASSEMBLY OR POSSESSION OF CHEMICALS
FOR THE MANUFACTURE OF DRUGS (1) 2925.041(A) F2;
INVOLUNTARY MANSLAUGHTER (1) 2903.04(A) F1;
AGGRAVATED POSSESSION OF DRUGS (1)
2925.11(A)(C)(1) F5;
ILLEGAL USE OR POSSESSION OF DRUG
PARAPHERNALIA (1) 2925.14(C)(1) M4

In the Common Pleas Court of Summit County, Ohio, of the term of MARCH in the year of our Lord, Two Thousand and Twelve,

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, being duly impaneled and sworn and charged to inquire of and present all offenses whatever committed within the limits of said County, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO,

COUNT FIVE

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that A) **RONALD S. LEGG** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ENDANGERING CHILDREN** in that he did recklessly abuse Patrick Lerch, a child under eighteen years of age (D.O.B. 9/10/10), resulting in serious physical harm to said child, in violation of Section 2919.22(B)(1) of the Ohio Revised Code, A FELONY OF THE SECOND DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT SIX

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **MURDER** in that he did cause the death of Patrick Lerch as a proximate result of **A) RONALD S. LEGG**, committing or attempting to commit Endangering Children, an offense of violence that is a felony of the first or second degree, in violation of Section 2903.02(B) of the Ohio Revised Code, A SPECIAL FELONY, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT SEVEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ENDANGERING CHILDREN** in that she did recklessly abuse Patrick Lerch, a child under eighteen years of age (D.O.B. 9/10/10), resulting in serious physical harm to said child, in violation of Section 2919.22(B)(1) of the Ohio Revised Code, A FELONY OF THE SECOND DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT EIGHT

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **MURDER** in that she did cause the death of Patrick Lerch as a proximate result of **D) HEATHER M. LERCH** committing or attempting to commit Endangering Children, an offense of violence that is a felony of the first or second degree, in violation of Section 2903.02(B) of the Ohio Revised Code, A SPECIAL FELONY, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT NINE

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **COMPLICITY TO COMMIT ENDANGERING CHILDREN** in that she did aid or abet another to recklessly abuse Patrick Lerch, a child under eighteen years of age (D.O.B. 9/10/10), resulting in serious physical harm to said child in violation of Section 2929.22(B)(1) and 2923.03 of the Ohio Revised Code, A FELONY OF THE SECOND DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT TEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **COMPLICITY TO COMMIT MURDER** in that she did cause the death of Patrick Lerch as a proximate result of **D) HEATHER LERCH** aiding and abetting another in committing or attempting to commit Endangering Children, an offense of violence that is a felony of the first or second degree, in violation of Section 2903.02(B) and 2923.03 of the Ohio Revised Code, A SPECIAL FELONY, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT ELEVEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **D) HEATHER D. LERCH** on or about the 10th day of September, 2010 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ENDANGERING CHILDREN** in that she did being a parent, guardian, custodian, person having custody or control, or person in loco parentis of Patrick Lerch, a child under eighteen years of age (D.O.B. 9/10/2010), did recklessly create a substantial risk to the health or safety of the child by violating a duty of care, protection, or support resulting in serious physical harm to said child in violation of Section 2919.22(A) of the Ohio Revised Code, A FELONY OF THE THIRD DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT TWELVE

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **D) HEATHER M. LERCH** on or about the 10th day of September, 2010 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **INVOLUNTARY MANSLAUGHTER** in that she did cause the death of Patrick Lerch as a proximate result of **D) HEATHER M. LERCH** committing or attempting to commit the offense of Endangering Children, a felony, in violation of Section 2903.04(A) of the Ohio Revised Code, A FELONY OF THE FIRST DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT THIRTEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ENDANGERING CHILDREN** in that they did recklessly allow a child, Patrick Lerch (D.O.B. 9/10/2010), to be on the same parcel of real property and within one hundred feet of, or, in the case of more than one housing unit on the same parcel of real property, in the same housing unit and within one hundred feet of, any act in violation of Section 2925.04 or 2925.041 of the Revised Code when the person knows that the act is occurring, whether or not any person is prosecuted for or convicted of a violation of Section 2925.04 or 2925.041 of the Revised Code, that is the basis of the violation of this division resulting in serious physical harm to said child in violation of Section 2919.22(B)(6) of the Ohio Revised Code, A FELONY OF THE SECOND DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT FOURTEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **INVOLUNTARY MANSLAUGHTER** in that they did cause the death of Patrick Lerch as a proximate result of **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** committing or attempting to commit the offense of Endangering Children Section 2919.22(B)(6), a felony, in violation of Section 2903.04(A) of the Ohio Revised Code, A FELONY THE FIRST DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT FIFTEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ILLEGAL MANUFACTURE OF DRUGS** in that they did knowingly manufacture or otherwise engage in any part of the production of a drug, methamphetamine, a schedule II controlled substance, in the vicinity of Patrick Lerch (D.O.B. 9/10/2010), a juvenile, in violation of Section 2925.04(A) of the Ohio Revised Code, A FELONY OF THE FIRST DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT SIXTEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **INVOLUNTARY MANSLAUGHTER** in that they did cause the death of Patrick Lerch as a proximate result of **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** committing or attempting to commit the offense of Illegal Manufacture of Drugs, a felony, in violation of Section 2903.04(A) of the Ohio Revised Code, A FELONY OF THE FIRST DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT SEVENTEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ILLEGAL ASSEMBLY OR POSSESSION OF CHEMICALS FOR THE MANUFACTURE OF DRUGS** in that they knowingly did assemble or possess one or more chemicals that may be used to manufacture a controlled substance with the intent to manufacture a drug, to wit: methamphetamine, a schedule II controlled substance, in the vicinity of Patrick Lerch, (D.O.B. 9/10/2010) a juvenile, in violation of Section 2925.041(A) of the Ohio Revised Code, A FELONY OF THE SECOND DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT EIGHTEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 12th day of February, 2012 through the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **INVOLUNTARY MANSLAUGHTER** in that they did cause the death of Patrick Lerch, as a proximate result of **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** committing or attempting to commit the offense of Illegal Assembly or Possession of Chemicals for the Manufacture of Drugs, a felony, in violation of Section 2903.04(A) of the Ohio Revised Code, A **FELONY OF THE FIRST DEGREE**, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT NINETEEN

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **AGGRAVATED POSSESSION OF DRUGS** in that they did knowingly obtain, possess, or use a drug, methamphetamine, a schedule II controlled substance in violation of Section 2925.11(A)(C)(1) of the Ohio Revised Code, A **FELONY OF THE FIFTH DEGREE**, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

COUNT TWENTY

And the Grand Jurors of the State of Ohio, within and for the body of the County of Summit aforesaid, on their oaths in the name and by the authority of the State of Ohio, DO FURTHER FIND AND PRESENT, that **A) RONALD S. LEGG B) ALLEN R. KOSTRA C) RANDY L. LEGG D) HEATHER M. LERCH** on or about the 26th day of February, 2012, in the County of Summit aforesaid, did commit the crime of **ILLEGAL USE OR POSSESSION OF DRUG PARAPHERNALIA** in that they did knowingly use or possess with purpose to use, drug paraphernalia, in violation of Section 2925.14(C)(1) of the Ohio Revised Code, A MISDEMEANOR OF THE FOURTH DEGREE, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of Ohio.

Sherrri Bevan Walsh
SHERRI BEVAN WALSH, Prosecutor/tls
County of Summit, Ohio

Prosecutor, County of Summit, by

SI Gregory W. Peck DATE: 3-30-12

Grand Jury Foreperson/Deputy Foreperson

A TRUE BILL